

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

Jorge Alejandro Rojas,

Plaintiff/Counter-Defendant,

v.

DV Injury Law PLLC, Venar Raad Ayar,
and Daniel P. Heilbrun,

Defendants/Counter-Plaintiffs/Third-Party
Plaintiffs.

v.

Mark Dombrowski,

Third-Party Defendant.

Case No. 2:23-cv-12140-LVP-EAS

PLAINTIFF/COUNTER DEFENDANT JORGE ALEJANDRO ROJAS' WITNESS LIST

NOW COMES, the Plaintiff/Counter-Defendant, JORGE ALEJANDRO ROJAS, by and through his attorneys and for his Witness List hereby identifies the following:

WITNESSES

I. Parties, including, but not limited to:

- A. Jorge Alejandro Rojas
- B. Venar Raad Ayar
- C. Representatives, agents, and/or employees of DV Injury Law PLLC, including but not limited to:
 - 1. Daniel P. Heilbrun
 - 2. Adam Haimour
 - 3. Jason Karowski
 - 4. Elizabeth Yount
- D. Mark Dombrowski

II. Other Fact and/or Lay Witnesses, including, but not limited to:

- A. Representatives, agents, and/or employees of Bird Dog Media Group.
- B. Representatives, agents, and/or employees of Tiburon Media
- C. Representatives, agents, and/or employees of Talk IT Pro, LLC, 30095 Northwestern Hwy, #40A Farmington Hills, MI 48334
- D. Representatives, agents, and/or employees of Bezalu, LLC
- E. Representatives, agents, and/or employees of T-Mobile, USA Inc., 4 Sylvan Way Parsippany, NJ 07054
- F. Representatives, agents, and/or employees of NWCC Services, 30095 Northwestern Hwy, Suite #10A Farmington Hills, MI 48334
- G. Aaron Heering
- H. Mark Nowicki
- I. Federal Aviation Administration, Office of the Chief Counsel, 800 Independence Ave, SW, Washington, DC 20591

III. Experts

Defendant does not anticipate calling any experts in this matter at this time.¹

¹ Plaintiff reserves the right to supplement the naming of experts provided herein by operation of applicable law/rule and/or by appropriate motion. References to individuals and/or entities herein may include (whether actual or ostensible) any/all former/current subrogors, subrogees, agents, principals, partners, affiliates, officers, directors, servants, employees, employers, joint venturers, departments, branches, subdivisions, customers, insurers, regulators, investigators, service (including, but not limited to, internet, phone, utility, email, fax, social media, web hosting, and cloud storage) providers, independent contractors, and/or record custodians. Fact witnesses may be called upon to offer factual testimony and/or expert testimony within the scope of his or her specialty and/or experience. Expert witnesses may be called upon to offer factual testimony and/or expert testimony within the scope of his or her specialty and/or experience and may also be called upon to offer factual testimony. Plaintiff also hereby objects to any Defendant's use of any improperly identified witness (expert or otherwise). Any reference to another party's putative experts/specialists herein is not to be construed as an endorsement of his/her/its qualifications and the sponsoring party is left to its proofs regarding the same.

IV. Miscellaneous witnesses, including, but not limited to:

- A. All witnesses named in any witness list filed by any party to this litigation regardless of whether called by the listing party at the time of trial.
- B. Any and all necessary rebuttal witnesses.
- C. Any and all witnesses that become known up to and through trial.
- D. Any and all individuals named in discovery, pleadings, or other documents, including, but not limited to, interrogatories, requests to produce, requests to admit, depositions, etc.
- E. Any and all individuals necessary to authenticate, interpret, identify, lay the foundation for, and/or introduce any and all exhibits.
- F. Plaintiff reserves the right to call additional individuals/entities that become known throughout the course of discovery and/or trial.
- G. Plaintiff reserves the right to supplement its witness list(s) throughout the course of discovery and/or trial.

Law Offices of

JOHNSTON, SZTYKIEL, HUNT, FRASER
GOLD & BARRON, P.C. .

BY /s/ Jeanne V. Barron
JEANNE V. BARRON (P37138)
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